## Exhibit 1

## **Proposed Order**

## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN

In re	) Chapter 9
CITY OF DETROIT, MICHIGAN,	) Case No. 13-53846
Debtor.	) ) Hon. Steven W. Rhodes

# ORDER GRANTING SYNCORA'S MOTION TO EXCLUDE THE TESTIMONY OF MARTHA KOPACZ

This matter having come before the Court on the motion of Syncora Guarantee Inc. and Syncora Capital Assurance Inc. ("Syncora") for the entry of an order excluding Martha Kopacz's testimony and opinions regarding the City's forecasts and underlying assumptions, the Court having reviewed Syncora's motion; and the Court having determined that the legal and factual bases set forth in the motion establish just cause for the relief granted herein;

#### IT IS HEREBY ORDERED THAT:

- 1. Syncora's Motion to Exclude the Testimony of Martha Kopacz is GRANTED.
- 2. The Debtor, the City of Detroit (the "<u>City</u>"), is precluded from introducing testimony or opinions from Ms. Kopacz regarding the City's forecasts and underlying assumptions.

- 3. Syncora is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the motion.
- 4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
- 5. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

IT IS SO ORDERED.